

February 7, 2022

BY HAND

Judge Jesse M. Furman
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

RE: *United States v. Joshua Adam Schulte*, S3 17 Cr. 548 (JMF)

Dear Judge Furman:

After reviewing the government's classified CIPA 10 disclosure, I ask the court's permission to file a motion to suppress the government's unlawful seizure of my attorney-client privileged email to counsel, wherein I detail the FBI's interrogation of me. The government illegally seized this privileged email, incorrectly labeled it a "Schulte Article," and apparently intend to use it against me at trial. See CIPA 10 disclosure at 3-4.

The government did not rely upon this evidence at trial as it was readily apparent the document was attorney-client privileged; it was written for, and only emailed to, my attorney, for the sole purpose of my defense.

Now that the government intends to use it at the upcoming trial, I write for permission to file a motion to suppress its introduction at trial. I note for the court that, since it was never introduced at my first trial, my former counsel never moved to suppress it.

The Government shall respond to Defendant's letter by
February 11, 2022. SO ORDERED.



February 7, 2022

Respectfully submitted,

Joshua Adam Schulte

